

REMARKS

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendment, claims 1, and 3-16 are pending in the application, with claims 1, 10, and 16 being the independent claims. These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the above Amendment and the following Remarks, Applicants respectfully request that the Examiner reconsider all outstanding rejections and that they be withdrawn.

Examiner Interview

Applicants thank the Examiner for the telephonic interview of March 21, 2006. Claim 1 and the Le Berre reference were discussed. No specific agreement was reached.

Rejections under 35 U.S.C. § 102

In the Action on pages 2-4, sections 3-12, claims 1-16 are rejected as being anticipated by EP 0 940 960 A1 to Le Berre (hereinafter "Le Berre"). Applicants respectfully traverse the rejection.

As amended, claim 1 recites: A method for secure mutual authentication comprising the steps of: authenticating a customer at a first web site; receiving a selection from said customer at said first web site requiring transfer to a second web site, **wherein said first web site is independent of said second web site; generating an authentication message** for said customer at said first web site, **said authentication message devoid of intelligent information of said customer and comprising a permanent customer pseudonym that uniquely identifies said customer and is devoid of intelligent information of said customer;** and transferring said authentication message from said first web site to said second web site for authentication of said customer by said second web site. Le Berre fails to teach at least two elements of claim 1.

First, Le Berre fails to teach receiving a selection from said customer at said first web site requiring transfer to a second web site, wherein said first web site is independent of said second web site. Instead, Le Berre teaches a multi-horned resource **within one organization**. See, e.g., Le Berre, col. 2, para. 07, 16, and 30. The multi-horned resources of Le Berre have access to the same

authentication services. Le Berre does not teach transfer between web sites that are independent of each other. In contrast, in claim 1, the first and second web sites are independent of each other, as described, for example, on page 2, para. 5 of the specification.

Second, Le Berre fails to teach generating an authentication message that comprises a customer pseudonym that uniquely identifies the customer and is devoid of intelligent information of the customer. As disclosed in the specification, the customer pseudonym is unique for a specific customer from a specific site. In operation, the same customer pseudonym could be generated by different partner sites and still be valid. See, e.g., specification, page 9, lines 17-18. Instead, Le Berre teaches sending a signed URL from a first to a second website. The format of the signed URL includes a user ID, which is a "string representing the user." See Le Berre, col. 6, line 41. The signed URL as shown in FIG. 5 of Le Berre does not contain a customer pseudonym that is devoid of intelligent information of the customer, and instead, contains intelligent information of the customer. The user ID and other components of the signed URL in Le Berre are used by Surlserver B to identify a customer in order to authenticate the customer at the second website. Le Berre, col. 9, para. 0032. In contrast, the authentication message of claim 1 comprises a customer pseudonym that is devoid of any intelligent information of the customer. Therefore, Le Berre fails to teach an authentication message that comprises a customer pseudonym that uniquely identifies the customer and is devoid of intelligent information of the customer.

Because Le Berre fails to teach at least two features of claim 1, Applicants respectfully assert that claim 1 is not anticipated by Le Berre and request that the rejection be withdrawn.

Claims 3-9 depend from claim 1 and are allowable as being dependent from an allowable claim.

Claims 10 and 16 as amended recite features similar to those in claim 1 and are allowable for at least the same reasons as given above for claim 1.

Claims 11-15 depend from claim 10 and are allowable as being dependent from an allowable claim.

Conclusion

All of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is hereby invited to telephone the undersigned at the number provided.

Dated:

April 11, 2006

Respectfully submitted,

By 

Caroline J. Swindell

Registration No.: 56,784

Michael A. Sartori, Ph.D.

Registration No.: 41,289

VENABLE LLP

P.O. Box 34385

Washington, DC 20043-9998

(202) 344-4000

(202) 344-8300 (Fax)

Attorney For Applicant

::ODMA\PCDOCS\DC2DOCS\1\738391\1